

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

BRRAM, INC., a corporation organized under the laws of the Commonwealth of Pennsylvania, Ms. Holly Bussey, Mr. William Lynch, Mr. Richard DeLello, Ms. Julie Power, Mr. John Giacobetti and Mrs. Jennifer Giacobetti, Ms. Deborah Leamann, Ms. Caroline Bondi, Ms. Delores Brienza, and Mr. Richard Wayne,

Plaintiff,

V.

UNITED STATES FEDERAL AVIATION  
ADMINISTRATION (FAA), the Mercer  
County Board of Chosen Freeholders, and  
Frontier Airlines, Inc.,

Defendant.

Civil Action No. 3:14-cv-02686(JAP)(DEA)

**CERTIFICATION OF  
JOHN E. FLAHERTY  
IN SUPPORT OF APPLICATION FOR  
ADMISSIONS PRO HAC VICE**

I, John E. Flaherty, an attorney duly admitted to practice law in the Courts of the State of New Jersey and the United States District Court for the District of New Jersey, and of full age, certify pursuant to Local Civil Rule 101.1(c), as follows.

1. I am a member of the law firm of McCarter & English, LLP, attorneys for defendant Frontier Airlines, Inc. (“Defendant”) in the within matter. I submit this Certification in support of Defendant’s application seeking admissions of Robert E. Cohn, Justin A. Savage and Emily E. Kimball as counsel *pro hac vice* in the within matter pursuant to Local Civil Rule 101.1(c). I am personally familiar with the facts set forth in this Certification.

2. I am in good standing in all the bars of which I am a member. I have never been subjected to any discipline by any court or governing body.

3. All parties in interest have consented to the admissions of Robert E. Cohn, Justin A. Savage and Emily E. Kimball sought by this application.

4. If the Court grants the *pro hac vice* admissions of Robert E. Cohn, Justin A. Savage and Emily E. Kimball, either I or another attorney associated with McCarter & English, LLP, will continue to serve as local counsel of record in this matter, will review and sign all pleadings, briefs and other papers filed with the Court, will be responsible for the conduct of this action and for the conduct of the attorney admitted *pro hac vice*, will accept service of all papers filed with the Court, will appear at all scheduled Court proceedings, and will otherwise comply with all the terms and conditions of Local Civil Rule 101.1(c).

5. If the Court grants the *pro hac vice* admissions of Robert E. Cohn, Justin A. Savage and Emily E. Kimball, I will ensure that *pro hac vice* counsel shall comply with Local Civil Rule 101.1(c).

For the foregoing reasons and the reasons set forth in the Certifications of Robert E. Cohn, Justin A. Savage and Emily E. Kimball, it is respectfully requested that the Court grant the application of Defendant to admit Robert E. Cohn, Justin A. Savage and Emily E. Kimball *pro hac vice* to appear and participate as Defendant's counsel in this matter pursuant to Local Civil Rule 101.1(c).

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 20, 2014

s/ John E. Flaherty  
John E. Flaherty